

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO.

DECLARATION OF K.W.

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ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 I, K.W., declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make
3 this declaration based on my personal knowledge.

4 2. I live in Seattle, Washington with my husband and two children. I am employed
5 as an Episcopal priest and my husband is employed as a firefighter.

6 3. My oldest child is transgender. He is currently 14 years old and is in the ninth
7 grade. I have chosen to use my initials and refer to my child in this declaration as "Child A"
8 because I am fearful for his and our family's safety and privacy in the current political climate.

9 4. Child A came out as transgender when he was 12 years old.

10 5. We always thought he was more of a tomboy growing up, but there were signs
11 he was feeling dysphoria starting at a very young age. When Child A was 3 years old, we found
12 his book of Santa drawings. In it, we also found his wish list for Santa, where he had written, "I
13 want a red bike" and "I wish I was a boy."

14 6. Child A loathed wearing dresses. His grandmother would sew him dresses for the
15 holidays, and he hated it. He would scream and rip them off. When he was four, he declared,
16 "I'm not wearing dresses anymore." And said, "I want to wear clothes like my brother and my
17 dad." We accommodated him. Our family is not really into traditional gender roles, so there is
18 more room to look different. At the time, we just thought Child A was not very femme. I am not
19 super femme either, so I thought he was just not femme like me.

20 7. My husband and I have always had close friends from the gay community and
21 were very inclusive, but it never crossed my mind at that time that Child A might be trans. I just
22 assumed he was cis.

23 8. When Child A was around seven or eight, we had given him books on what
24 happened in puberty. It broke my heart to learn years later that when he read those books, he
25 went into a state of denial, thinking "this isn't going to happen to me" and had this magical
26 thinking that his body would not be going through puberty.

1 9. Child A started going through puberty early, at age 11. I watched as my child
2 began to isolate and withdraw himself from the world because of the dysphoria of going through
3 puberty in the wrong body. Once Child A's period started, I noticed that one week out of every
4 month his grades plummeted. I saw that my child was shutting down, but I didn't know why. He
5 wouldn't talk to me or anyone. Our kid had disappeared, and I didn't know how to help.

6 10. Child A hid in oversized clothing to hide his body. He wore a huge thick black
7 hoodie to run a 5k in the summer in 95-degree heat and 85 percent humidity. He would not drink
8 water and constantly suffered from dehydration because, as I later learned, he feared using the
9 restrooms at school. He did not feel safe. There were those big gaps at the top and bottom of the
10 stalls. Kids crawled around and under those stalls all the time. And he knew that sometimes
11 people would sneak and take videos of people in the bathroom. He did not want to chance anyone
12 seeing his body.

13 11. Child A went through a phase in which he started questioning his gender. It pains
14 me to learn of how he struggled. He would think that maybe he was a boy but would then freak
15 out when confronting what that would all mean. He would get overcome with anxiety and
16 depression. He knew that everything in his life after that would be so hard. He thought about
17 how scary it would be to transition. And he worried that he would disappoint us, his parents. So,
18 my child tried to compromise with himself, telling himself, "Maybe I'm just gender fluid." But
19 when Child A was twelve, he realized that he could no longer deny it – he is a boy.

20 12. At the time Child A came out as transgender, our family was living in a small
21 town in Connecticut. He began with social transitioning first, cutting his hair short, changing his
22 clothing, and using he/him pronouns. I found a therapist for Child A to speak with from an
23 adolescent gender clinic and made an appointment with his primary care provider. This was the
24 first step in seeking gender-affirming care. His primary care provider was very supportive and
25 referred us to an endocrinologist and a pediatrician that specialized in gender-affirming care.
26 Child A was on a waitlist for almost a year while we waited to seek treatment from an

1 endocrinologist, before he was finally prescribed puberty blockers. Throughout this process,
2 Child A suffered from anxiety and depression. Child A felt isolated and discouraged that some
3 of his peers would not even consider his transgender identity as a reality or would mock him.
4 His psychiatrist indicated the anxiety and depression directly stemmed from being transgender
5 in a transphobic world and the agony of coming out as an adolescent. It is our hope that with
6 gender-affirming medical care, Child A can alleviate these symptoms.

7 13. In July 2024, our family moved back to Seattle, Washington, primarily because
8 we felt this was the safest place for Child A. When we moved back to Seattle, Child A got a
9 chance to start all over again, to show up as his authentic self at a new school, in a new
10 community, that never knew him any differently, and that was just more inclusive and supportive
11 anyway. We found gender-affirming care for Child A at an adolescent care clinic in Seattle and
12 picked up where he left off, on puberty blockers. When he turned 14, Child A began working
13 with a psychiatrist, therapist, and doctor and started testosterone.

14 14. With the help of this holistic team, Child A has started to feel more like himself,
15 and to feel comfortable in his own body. With each step of gender-affirming care and claiming
16 his identity, our child has returned to us. He is gaining confidence in being his authentic self,
17 and in being in this world. It has been a cumbersome, complex process to access gender-
18 affirming medical care for Child A, but it is so worth it to see my child come back to life.

19 15. Child A is working towards top surgery, but the wait is three to four years. In the
20 meantime, Child A binds his chest. Binding is painful and uncomfortable and makes it difficult
21 for him to breathe. It has caused damage his ribs when playing sports. Receiving gender-
22 affirming care top surgery will make his life so much easier, and make him so much more
23 comfortable in his body, both physically and also from a mental health aspect, because it would
24 help him feel like his true self. Child A can't wait and is so looking forward to feeling totally
25 like himself in his own body.
26

1 16. It would be devastating for Child A to be denied gender-affirming care. It would
 2 be like having the rug pulled out from under his feet – from under all our feet – after all the time
 3 and effort spent supporting his transition and seeing how much he’s benefitted from getting this
 4 care. I fear how traumatic it would be for Child A and fear for his mental health. I fear my child
 5 would just shut down again. I fear his depression would return and be significantly worse. As a
 6 firefighter, my husband sees how so many of the unhoused he helps are trans. He has shared with
 7 me about how, every day, he sees trans folks debilitated and dying from depression and substance
 8 abuse. Every day, he agonizes about what if this happens to our child. That thought is so
 9 terrifying that I cannot even go there.

10 17. If my child is denied this care, my family has discussed seeking healthcare in
 11 British Columbia. We have also started researching colleges in Canada but Child A is still only
 12 in ninth grade. Both my husband and I have jobs serving the people of Seattle, so it does not
 13 seem feasible for us to pick up and move. But if we must, we will send Child A to live with a
 14 close friend who is like family in Canada. We will do whatever we need to do to make sure our
 15 child can stay safe and get the care that he needs.

16 18. My husband and I do not have the capacity to challenge the Executive Order in
 17 court ourselves and we need the Attorney General to take up this cause on our behalf. We do not
 18 have the time or resources. But more importantly, we do not want to risk our family’s safety and
 19 expose our children to harassment and violence. We also fear retaliation from this administration
 20 and from other anti-trans groups.

21 I declare under penalty of perjury under the laws of the State of Washington and the
 22 United States of America that the foregoing is true and correct.

23 DATED this ____ day of February 2025 at _____, Washington.

24 _____
 25 K.W.
 26 Parent of Child A

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I declare under penalty of perjury under the laws of the State of Washington and the United States of America that the foregoing is true and correct.

DATED this 3 day of February 2025 at Seattle, Washington.


K.W.

Parent of Child A